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*Attorneys for Bank Leumi USA*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re

Chapter 11

Joseph Klaynberg,

Case No. 22-10165 (MG)

Debtor.  
-----X

**NOTICE OF APPEARANCE  
AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that Farrell Fritz, P.C. hereby appears in the above-captioned Chapter 11 case as attorneys for Bank Leumi USA, a creditor and party in interest.

**PLEASE TAKE FURTHER NOTICE** that Farrell Fritz, P.C. requests that, pursuant to Sections 102(1), 342 and 1109(b) of Title 11, United States Code (the “Bankruptcy Code”) and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), copies of all notices given or required to be given in these cases and all papers served or required to be served in these cases be given to and served upon:

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**PLEASE TAKE FURTHER NOTICE** that pursuant to Section 1109(b) of the Bankruptcy Code the foregoing request includes not only the notices of papers referred to in the Bankruptcy Rules and Bankruptcy Code provisions specified above, but also includes, without limitation, any notice, application, motion, petition, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand or courier delivery, telephone, telegraph, telecopy, telex, electronically or otherwise filed with regard to these cases and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this notice, any subsequent appearance (by pleading or otherwise), nor any participation in or in connection with these cases is intended to waive (i) the right to have final orders in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) the right to trial by jury in any case, controversy or proceeding; (iii) the right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs or recoupments, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

**PLEASE TAKE FURTHER NOTICE** that request is also made that the undersigned be added to any official service list for notices of all contested matters, adversary proceedings or other proceedings in these cases.

Dated: New York, New York  
March 1, 2022

**FARRELL FRITZ, P.C.**

By: /s/ Martin G. Bunin

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